

Horry County, South Carolina
2560 Main Street #4
Conway, SC 29526
June 1, 2012

VIA ELECTRONIC MAIL

Federal Communications Commission
445 12th Street SW
Washington, DC 20554
Attn: Public Safety & Homeland Security Bureau

Subject: Waiver Extension Request for the JANUARY 1, 2013 Narrowbanding Deadline

To Whom It May Concern:

Horry County, SC requests a Waiver of Section 90.209(b) of the Commission's Rules regarding the Federal Communication Commission's January 1, 2013 VHF/UHF narrowbanding deadline, which requires private land mobile radio licensees in the 150-174 MHz and 450-512 MHz bands to operate using channel bandwidth of no more than 12.5 kHz or equivalent efficiency by January 1, 2013.

Horry County recognizes that the FCC has noted: Requests for extension will be subject to a high level of scrutiny and Licensees will be expected to demonstrate that they have worked diligently and in good faith to adhere to the January 1, 2013 VHF/UHF narrowbanding deadline. Specifically, the Licensee requests until December 31, 2013 to complete its VHF equipment narrowbanding.

The public interest would be served by granting the requested waiver because it would allow Horry County to transition their VHF operations that are the subject of the Waiver Requests onto the planned County 800 MHz Project 25 (P25) system upgrade and release the VHF channels for use by other licensees. However, because the new P25 system will not be operational by the January 1, 2013 narrowbanding deadline, Horry County requests a waiver of the deadline until December 31, 2013 to avoid having to divert financial, technical, and administrative resources to narrowband their existing VHF facilities, even though they plan to decommission these facilities and vacate their VHF channels no more that twelve months later when they migrate to the County P25 system.

Background

Horry County is the largest county in the State of South Carolina covering a total area of 1,255 square miles. The City of Myrtle Beach is located in the Grand Strand area of Horry County and boasts significant tourism (approximately 15 million visitors each summer). This influx of population makes public safety communications and interoperability among County agencies and the surrounding counties a priority. Presently, Horry County operates a six (6) site, sixteen (16) channel Motorola SmartNet 3.1 simulcast 800 MHz trunked radio system; an Astro conventional simulcast six (6) site system, and three (3) single site conventional channels and has a relatively large number of 800 MHz subscriber units (over 3,800) spread across thirty (30) separate agencies operating on the system. Additionally, Horry County operates a single (1) site, 1 channel VHF system for County fire paging under the call sign WPML296. The paging system includes over 350 units (Motorola Minitor pagers) and was placed into operation in 2003. These units are older models and must be replaced to support the narrowband operational requirements.

Horry County developed a strategic communications plan as part of rebanding back in 2008 and began narrowband planning in early 2010. The County explored available options with equipment vendors and the impact to the County's strategic communications plan. Horry County operates a County-wide 800 MHz trunked radio system and is planning to upgrade the system to P25 compliant system in 2013. With this upgrade, the County has elected to move their VHF equipment over to the P25 system. Horry County will procure Motorola's new APX4000 pagers that are P25 compliant and operate on the 800 MHz system. This system change will significantly improve direct interoperability among the multiple agencies operating in Horry County and the surrounding counties. With the migration, Horry County would then release the VHF channels for use by other licensees.

Steps Taken

Horry County has already taken the following steps toward upgrading their 800 MHz system and narrowband the VHF equipment.

- Horry County has worked diligently and has met with the equipment vendors and the local radio service facility to fully understand the requirements, cost, and schedule for upgrading the existing 800 MHz communications system to P25.
- Horry County has fully assessed the schedule impact – as the County is the host of major motorcycle rallies, Spring Break, and summer tourist activities held from April to September each year. These activities bring millions of tourists to Horry County – which impacts the schedule for upgrading the radio system to P25 and narrowbanding the VHF equipment.
- Horry County has presented the costs to County Council and received approval for proceeding with the upgrade. Costs have been included in the County's 2013 budget.

- Horry County has reviewed their VHF licenses and do not foresee a negative impact with surrounding co-channel and adjacent channel licensees. Horry County interoperates with the following agencies on the VHF system:
 - City of Conway
 - City of North Myrtle Beach
 - City of Myrtle Beach
 - City of Loris
 - City of Aynor
 - City of Fair Bluff, NC
 - City of Surfside Beach
 - City of Tabor City, NC
 - City of Mullins
 - All County Hospitals
 - LifeCare Helicopters
 - Coastal Carolina University
 - Murrells Inlet/Garden City
- Horry County anticipates releasing the 154.4000 MHz VHF spectrum upon migration to the P25 system.

Narrowbanding Timetable

Index	Activity	Proposed Start	Proposed Completion
1.	Develop initial plan and migration strategy	2/2010	12/2010
2.	Obtain options and system P25 upgrade pricing from Motorola	1/2011	10/2011
3.	Prepare and present plan to County Council	3/2012	4/2012
4.	Funding sources identified using current county funding mechanism (i.e County Bond Issuance, County Landfill Fee Collection)	3/2012	4/2012
5.	Obtained and reviewed internal procurement requirements	3/2012	3/2012
6.	Submitted Ordinance for additional tower sites	3/2012	3/2012
7.	Identified and reviewed tower site parcels	2/2012	3/2012
8.	Finalize system configuration (subscribers & infrastructure)	4/2012	7/2012
9.	Finalize agreement for purchase	8/2012	12/2012
10.	Initiate upgrade to P25	4/2013	
11.	Tower build-out	5/2013	8/2013
12.	Reconfigure fixed equipment	8/2013	9/2013
13.	Transition approx. 3,800 voice subscriber units	9/2013	9/2014
14.	Migrate VHF operations to P25 system	10/2013	10/2013
15.	In conjunction with P25 transition, dismantle VHF infrastructure	11/2013	12/2013
16.	Release VHF channels	12/2013	12/2013
17.	P25 System Testing and Acceptance	2014	
18.	Project Close-Out	2015	

Horry County believes this request for extension is in the public interest and has shown diligence in planning for and implementing the upgrade of their 800 MHz communications system to P25, which will enable them to decommission their existing VHF wideband facilities and vacate their VHF frequencies. Planning for the upgrade began three years ago and the County has secured the funding of the new system through budgetary planning.

Horry County believes the size and complexity of the P25 upgrade coupled with the tourism impact justifies the request for a one-year waiver period and is reasonably necessary to vacate the VHF frequencies.

Additionally, Horry County believes the grant of the waiver will not harm neighboring systems or impair interoperability during the one-year waiver period. The County has reviewed the licensees and does not foresee any negative impact on co-channel or adjacent channel operations.

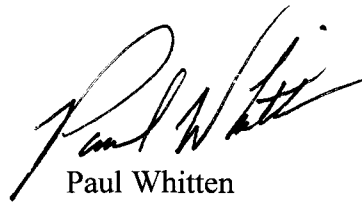
Finally, the grant of the waiver will avoid the diversion of Horry County's financial, technical, and administrative resources to narrowbanding their existing VHF facilities pending the transition to the 800 MHz band and will allow Horry County to devote their resources to decommissioning their existing wideband facilities and vacating their VHF frequencies.

Horry County believes this request is appropriate and respectfully requests an extension of the January 1, 2013 VHF/UHF Narrowband Deadline until December 31, 2013. Horry County will continue to provide the FCC with updates or modifications to the schedule as required.

Please accept this request for consideration.

Please contact John Enright or myself if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Whitten", is written over a light blue horizontal line.

Paul Whitten
Asst. County Administrator, Public Safety
Horry County

cc: John C. Enright
john_3gatorgroup@yahoo.com